



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

September 18, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission,
Bureau of Investigation and Enforcement v.
Interstate Nursing Services Inc. t/a Whitehall Medical Transport
Docket No. C-2020-
Formal Complaint

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Complaint in the above referenced case on behalf of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission. Copies have been served on the parties of record in accordance with the Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Christopher M. Andreoli
Prosecutor
PA Attorney ID No. 85676
(717) 772-8582
chandreoli@pa.gov

CMA/jfm
Enclosures

cc: Per Certificate of Service

NOTICE

A. **You must file an Answer within 20 days of the date of service of this Complaint.**

The date of service is the mailing date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission's website at www.puc.pa.gov. The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

Additionally, a copy should either be mailed to:

Christopher M. Andreoli, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17210

Or, emailed to Mr. Andreoli at: chandreoli@pa.gov

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the past due assessment and civil penalty within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mail to:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the requested relief set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2020-
	:	
Interstate Nursing Services Inc.	:	
t/a Whitehall Medical Transport	:	

FORMAL COMPLAINT

NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorneys, and files this Complaint against Interstate Nursing Services Inc. t/a Whitehall Medical Transport (“Respondent”), pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701. In support of its Complaint, I&E respectfully represents the following:

Parties and Jurisdiction

1. The Pennsylvania Public Utility Commission, with a mailing address of 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement and is the entity established by statute to prosecute complaints against public utilities pursuant to 66 Pa.C.S. § 308.2(a)(11). *See also Implementation of Act 129 of 2008;*

Organization of Bureaus and Offices, Docket No. M-2008-2071852 (Order entered August 11, 2011) at 5 (transferring authority to prosecute assessment cases to I&E).

3. Complainant is represented by:

Christopher M. Andreoli
Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
(717) 772-8582
chandreoli@pa.gov

Kourtney L. Myers
Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
(717) 705-4366
komyers@pa.gov

Michael L. Swindler
Deputy Chief Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120

4. Respondent is Interstate Nursing Services Inc. t/a Whitehall Medical Transport and maintains its principal place of business at 1041 North 6th Street, Whitehall, PA 18052, Attention: George Maragia.

5. Respondent is a “public utility” as that term is defined at 66 Pa.C.S. § 102, as it is engaged in transporting passengers in the Commonwealth of Pennsylvania for compensation.

6. The Commission issued Respondent a Certificate of Public Convenience on or about May 11, 2007, at A-00120508, for paratransit authority.

7. Section 501(a) of the Public Utility Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.

8. Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, authorizes the Commission to, *inter alia*, hear and determine complaints against public utilities for a violation of any law or regulation that the Commission has jurisdiction to administer.

9. Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility, or any other person or corporation subject to the Commission's authority, for violation(s) of the Public Utility Code and/or Commission regulations. Section 3301(a)-(b) of the Public Utility Code, 66 Pa.C.S. § 3301(a)-(b), allows for the imposition of a separate civil penalty for each violation and each day's continuance of such violation(s).

10. Respondent, in transporting passengers as a common carrier for compensation, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a public utility to comply with Commission regulations.

11. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

Factual Background

12. On or about September 20, 2018, the Commission mailed to Respondent, by first class mail, an assessment invoice for the July 1, 2018 to June 30, 2019 Fiscal Year (“2018-2019 Fiscal Year”) that was based, in part, on revenues for the 2017 calendar year that Respondent reported to the Commission in its 2017 Assessment Report. Respondent’s assessment was \$179. A copy of the assessment invoice is attached as Exhibit 1.

13. Accompanying the assessment invoice was a notice of assessment that informed Respondent that it was obligated to pay the amount listed on the assessment invoice within thirty (30) days or file objections within fifteen (15) days. A copy of the notice of assessment is attached as Exhibit 2.

14. While there is no record that the assessment invoice and notice of assessment were returned in the mail to the Commission as being undeliverable, on or about November 29, 2018, the Commission re-mailed to Respondent, by certified mail, the assessment invoice and notice of assessment since Respondent did not pay the amount listed on the assessment invoice within thirty (30) days or file objections within fifteen (15) days.

15. The assessment invoice and notice of assessment were mailed to Respondent at its last known mailing address of 1041 North 6th Street, Whitehall, PA 18052.

16. On December 3, 2018, Respondent received the assessment invoice and notice of assessment for the 2018-2019 Fiscal Year. A true and correct copy of proof of delivery of the assessment invoice and notice of assessment is attached as Exhibit 3.

17. The Commission received no objections from Respondent to the assessment amount set forth in the 2018-2019 Fiscal Year Assessment Invoice.

18. On or about June 24, 2019, the Commission's Bureau of Administration ("ADM") sent Respondent a letter warning Respondent that if it did not pay its 2018-2019 Fiscal Year Assessment within 20 days of receipt of the letter, then ADM would refer the matter to I&E for prosecution.

19. Respondent failed to pay the amount of the 2018-2019 Fiscal Year Assessment Invoice.

20. The total outstanding assessment balance for Respondent related to the 2018-2019 Fiscal Year is \$179.

Violation

21. That Respondent failed to satisfy its 2018-2019 Fiscal Year Assessment in that it did not pay the amount due within thirty (30) days of receipt of the invoice. If proven, this is a violation of Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c). The Bureau of Investigation and Enforcement's proposed civil penalty for this violation is 15% of the outstanding assessment balance or a minimum of \$50, whichever is greater. Therefore, I&E's proposed civil penalty for this violation is \$50.¹ This civil

¹ I&E anticipates that this level of penalty will provide a sufficient deterrent against future violations by Respondent.

penalty, consistent with past Commission decisions,² is based on Respondent's acceptable history of compliance with the Public Utility Code and Commission's regulations,³ the amount of Respondent's outstanding assessment balance related to the 2018-2019 Fiscal Year, and the need to deter future violations of the Public Utility Code and the Commission's regulations pursuant to 52 Pa. Code § 69.1201.⁴

WHEREFORE, for all the foregoing reasons, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement respectfully requests that:

- (a) Respondent be ordered to pay a total of \$229, which consists of its outstanding assessment balance of \$179 and a total civil penalty of \$50 for the above described violation. Said payment should be made by certified check or money order, made payable to the "Commonwealth of Pennsylvania" with the docket number of this proceeding listed, and mailed to the Secretary's Bureau of the Commission; and

² See *Pa. Pub. Util. Comm'n v. Juan Genet Enter., LLC t/a Safe Destinations*, Docket No. C-2014-2450660 (Order entered August 3, 2017); *Pa. Pub. Util. Comm'n v. Leo Movers & Storage, Inc.*, Docket No. C-2015-2494528 (Order entered August 3, 2017); *Pa. Pub. Util. Comm'n v. Hoffman Landscaping & Trucking, LLP*, Docket No. C-2015-2495061 (Order entered September 21, 2017); *Pa. Pub. Util. Comm'n v. Deer Haven, LLP*, Docket No. C-2015-2498095 (Order entered October 26, 2017); *Pa. Pub. Util. Comm'n v. Reach for the Stars Limousine Serv. Inc.*, Docket No. C-2015-2499276 (Order entered October 26, 2017).

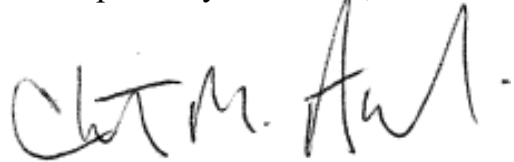
³ A review of the Commission's records for a period of three (3) years prior to the date of the filing of this Complaint demonstrates that Respondent has an acceptable compliance history with the Commission.

⁴ The Commission promulgated a Policy Statement at 52 Pa. Code § 69.1201 as a guideline that sets forth ten factors that are to be considered when evaluating whether and to what extent a civil penalty for violating a Commission order, regulation, or statute is warranted. Among these factors are the compliance history of the regulated entity that committed the violation, the amount of the civil penalty necessary to deter future violations, and past Commission decisions in similar situations. 52 Pa. Code §§ 69.1201(c)(6), (8), and (9).

(b) If payment of the assessment and civil penalty is not made, the Bureau of Investigation and Enforcement requests that:

- (1) the Commission issue an Order to cancel the Certificate of Public Convenience issued to Respondent;
- (2) this matter be referred to the Pennsylvania Office of Attorney General for appropriate action; and
- (3) the Commission certify automobile registrations to the Pennsylvania Department of Transportation for suspension or revocation.

Respectfully submitted,



Christopher M. Andreoli
Prosecutor
PA Attorney ID No. 85676

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120
(717) 772-8582
chandreoli@pa.gov

Date: September 18, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2020-
	:	
Interstate Nursing Services Inc.	:	
t/a Whitehall Medical Transport	:	

VERIFICATION

I, Amy Zuvich, Chief of Finance and Assessments, Bureau of Administration, Finance and Assessment Section, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: September 18, 2020



Amy Zuvich, Chief of Finance and Assessments
Finance and Assessment Section
Bureau of Administration
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

EXHIBIT 1



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
GENERAL ASSESSMENTS INVOICE

Invoice Date	Invoice Number
9/20/2018	18-641323
Fiscal Year	
July 1, 2018 to June 30, 2019	

INTERSTATE NURSING SERVICES INC
GEORGE MARAGIA
1041 NORTH 6TH
WHITEHALL PA 18052

- Read carefully Notice of Assessment
- Use return envelope provided
- Make check payable to:
Commonwealth of Pennsylvania

PUC Assessment	\$179.00
PAY THIS AMOUNT WITHIN 30 DAYS	\$179.00

TO RECEIVE PROPER CREDIT FOR YOUR PAYMENT, REMOVE THE BOTTOM PART OF THIS INVOICE AT THE PERFORATION AND RETURN WITH YOUR REMITTANCE

MAIL PAYMENT TO:
PA DOR
PO BOX 61380
HARRISBURG, PA 17106-1380

FOLD AND CUT HERE

RETURN THIS PORTION WITH YOUR REMITTANCE

INTERSTATE NURSING SERVICES INC
GEORGE MARAGIA
1041 NORTH 6TH
WHITEHALL PA 18052

Invoice Date	Invoice Number
9/20/2018	18-641323
Fiscal Year	
July 1, 2018 to June 30, 2019	

PAY THIS AMOUNT WITHIN 30 DAYS	\$179.00
---------------------------------------	-----------------

18000064132341 092018100000179002000000000030000000000 000000179001

EXHIBIT 2

**PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

NOTICE OF ASSESSMENT

**EXPLANATION OF BILL FOR GENERAL ASSESSMENT
FOR FISCAL YEAR JULY 1, 2018 TO JUNE 30, 2019**

In Section 510 of the Public Utility Code, 66 Pa. C.S. §510, the Pennsylvania General Assembly has authorized the Pennsylvania Public Utility Commission to assess all public utilities a percentage of their gross intrastate operating revenues for the preceding calendar year. Under Section 510, each public utility is required, on or before March 31 of each year to file with the Commission a statement of the utility's gross intrastate operating revenues for the preceding calendar year. After receiving the utilities' statements of gross intrastate operating revenues, the Commission sends general assessment invoices to all public utilities to advise each utility of the amount of assessment that utility owes based upon that utility's activity (gross intrastate operating revenues) in the preceding year. The enclosed assessment is for your proportionate share of the estimated expenses of the Public Utility Commission for the Commission's Fiscal Year July 1, 2018 to June 30, 2019.

YOU ARE REQUIRED TO PAY THIS BILL WITHIN THIRTY DAYS AFTER YOU RECEIVE IT. Objections to the assessment must be made in writing within 15 days and shall set out in detail the grounds upon which you regard the assessment to be excessive, erroneous, unlawful, or invalid. Objections may be filed only by the person, partnership, or corporation assessed. Filing an objection, however, does not eliminate your obligation to pay the assessment while your objection is being considered. **FAILURE TO PAY THE ASSESSMENT WHEN PAYMENT IS DUE WILL SUBJECT YOU TO PENALTIES.**

Be sure that your personal check or money order is written out in the same amount as your assessment invoice, and make your remittance payable to, "Commonwealth of PA". **DO NOT SEND CASH.** If you have reason to correspond with the Commission regarding your assessment invoice, please make reference to your invoice number. A receipt for payment will not be issued. Please mail your payment with the return portion of your invoice in the enclosed self-addressed envelope. Please note that rounding of your assessment to the nearest dollar has occurred. Your assessment for the PUC, including the OCA and the OSBA where applicable, has been combined into one invoice; one payment for all applicable assessments is acceptable. **A TWENTY (\$20.00) FEE WILL BE CHARGED FOR ALL DISHONORED OR BAD CHECKS REMITTED AS PAYMENT OF ASSESSMENTS.**

Your assessment has been computed by multiplying your gross intrastate operating revenues for the calendar year 2017 by the assessment factor for the public utility group of which you are a member. Your gross intrastate operating revenues for 2017 have been taken from the Assessment Reports Form GAO-17, AR-17-RR or AR-17-MC which you have filed with the Commission, or have been estimated by the Commission if you failed to file a timely report. Gross operating revenue reported to the Commission on the Assessment Reports may have been revised by the Commission to accurately reflect assessable revenue. The assessment factors for the various public utility groups are set forth in Schedule B enclosed herewith.

The approved estimate of expenditures of the Commission for the period July 1, 2018 to June 30, 2019 payable as a General Assessment by the public utilities which the Commission regulates has been determined as follows:

Approved budget for the Commission for the Fiscal Year July 1, 2018 through June 30, 2019:	\$72,645,000
Deduct:	
Pipeline Operators per Act 127 of 2011	560,497
Various Fees Collected in FY 2017-18	261,812
UGWF Administration per Act 13 of 2012	425,750
Prior Year cost saving	6,500,000
UCR Collection for CY 2017	4,945,527
EGS/NGS fees per Act 155 of 2014	<u>7,222,556</u>
Total Deductions	<u>\$19,916,142</u>
General Assessment Total Amount	\$52,728,858

The way in which the total Public Utility Commission assessment of \$52,907,092 has been allocated to the various groups of public utilities as shown on Schedules A and B enclosed herewith.



Rosemary Chiavetta
Secretary
PA Public Utility Commission

MAKE INQUIRIES TO:

Pennsylvania Public Utility Commission
Bureau of Administrative Services/Assess
P.O. Box 3265
Harrisburg, PA 17105-3265

FOR CERTIFIED AND EXPRESS CARRIERS

Pennsylvania Public Utility Commission
Bureau of Administrative Services/Assess
400 North Street
Harrisburg, PA 17120

CONTACT INFORMATION:

Assessment Section Information - Telephone 717-265-7548

Allocation of Expenses based on percent of prior year Public Utility Group workload
Budget Fiscal Year 2018-19

SCHEDULE A

Group	Total Expenditures per Utility Group Calendar Year 2017	Percentage Distribution	Estimated Expenditures Fiscal Year 2018- 2019 by Utility Group
Electric	\$21,243,064	43.7501%	\$23,068,928
Gas	\$10,759,883	22.1600%	\$11,684,715
Pipeline	\$284,623	0.5862%	\$309,097
Steam Heat	\$342,752	0.7059%	\$372,213
Tele./Tele.	\$5,553,209	11.4368%	\$6,030,494
Water/Sewer	\$5,726,077	11.7928%	\$6,218,209
Transportation - Passenger	\$1,755,451	3.6153%	\$1,906,306
Transportation - Property	\$355,421	0.7320%	\$385,975
Transportation - Rail	\$2,535,046	5.2209%	\$2,752,921
Total	\$48,555,526	100.00%	\$52,728,858

SCHEDULE B

Group	Estimated Expenditures Fiscal Year 2018- 2019 by Utility Group	Gross intrastate revenues by utility group Calendar Year 2017	General Assessment Factor by Utility Group (Col. (a) / by Col. (b))
	(a)	(b)	(c)
Electric	\$23,068,928	\$7,682,001,780	0.003002983944
Gas	\$11,684,715	\$3,419,307,726	0.003417275056
Pipeline	\$309,097	\$45,222,778	0.006834984795
Steam Heat	\$372,213	\$91,219,298	0.004080419474
Tele./Tele.	\$6,030,494	\$1,918,144,584	0.003143920459
Water/Sewer	\$6,218,209	\$1,311,010,982	0.004743064006
Transportation - Passenger	\$1,906,306	\$425,728,559	0.004477749871
Transportation - Property	\$385,975	\$526,643,186	0.000732896599
Transportation - Rail	\$2,752,921	\$115,712,775	0.023790985913
Total	\$52,728,858	\$15,534,991,668	0.003394199310

**SUPPLEMENTAL SCHEDULE
FEDERAL SHORTFALL RELATED TO GAS SAFETY APPLICABLE TO GAS PUBLIC UTILITIES
ONLY**

	Estimated Commission Federal Shortfall for Calendar Year 2017 and 6 Months of Calendar Year 2018	Actual Commission Federal Shortfall for Calendar Year 2017 and 6 Months of Calendar Year 2018	Estimated Commission Federal Shortfall for Calendar Year 2018 and 6 Months of Calendar Year 2019
Gas	\$0	\$0	\$0
	Net Estimated Commission Federal Shortfall for Fiscal Year 2018-19 Assessment	Reported Revenue for Gas Utility Group for Calendar Year 2017	Supplemental add- on Factor
Gas	\$0	\$3,419,307,726	0.000000000000

EXHIBIT 3

Track Another Package +

Tracking Number: 9171969009350215385654

[Remove X](#)

Your item was delivered to an individual at the address at 4:24 pm on December 3, 2018 in WHITEHALL, PA 18052.

Delivered

December 3, 2018 at 4:24 pm
Delivered, Left with Individual
WHITEHALL, PA 18052

Get Updates 

Feedback 

Text & Email Updates 

Return Receipt Electronic 

Tracking History 

December 3, 2018, 4:24 pm

Delivered, Left with Individual
WHITEHALL, PA 18052

Your item was delivered to an individual at the address at 4:24 pm on December 3, 2018 in WHITEHALL, PA 18052.

December 3, 2018, 8:52 am

Arrived at Unit
WHITEHALL, PA 18052

December 2, 2018, 11:56 am

Departed USPS Regional Facility
LEHIGH VALLEY PA DISTRIBUTION CENTER

December 1, 2018, 9:28 pm

Arrived at USPS Regional Facility
LEHIGH VALLEY PA DISTRIBUTION CENTER

December 1, 2018

In Transit to Next Facility

November 29, 2018, 6:17 pm
Arrived at USPS Regional Facility
HARRISBURG PA DISTRIBUTION CENTER

November 29, 2018, 5:02 pm
Accepted at USPS Origin Facility
HARRISBURG, PA 17120

November 29, 2018
Pre-Shipment Info Sent to USPS, USPS Awaiting Item

Product Information



See Less

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs

Feedback

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2020-
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t/a Whitehall Medical Transport	:	

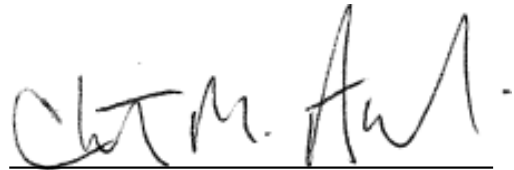
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Formal Complaint** in the manner and upon the parties listed below, in accordance with the requirements of 52 Pa. Code §§ 1.54 (relating to service by a party).

Served via Certified Mail

George Maragia
Interstate Nursing Services Inc.
t/a Whitehall Medical Transport
1041 North 6th Street
Whitehall, PA 18052
Tel: (610) 262-2403

George Maragia
P.O. Box 308
Whitehall, PA 18052-0308



Christopher M. Andreoli
Prosecutor
PA Attorney ID No. 85676

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 772-8582
chandreoli@pa.gov

Dated: September 18, 2020